

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

| | | |
|-----------------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, | § | |
| <i>ex rel.</i> ALEX DOE, Relator, | § | |
| | § | |
| THE STATE OF TEXAS, | § | |
| <i>ex rel.</i> ALEX DOE, Relator, | § | |
| | § | |
| THE STATE OF LOUISIANA, | § | |
| <i>ex rel.</i> ALEX DOE, Relator, | § | |
| Plaintiffs, | § | |
| v. | § | |
| | § | |
| PLANNED PARENTHOOD | § | |
| FEDERATION OF AMERICA, INC., | § | Civil Action No. 2:21-CV-00022-Z |
| PLANNED PARENTHOOD GULF | § | |
| COAST, INC., PLANNED | § | |
| PARENTHOOD OF GREATER | § | |
| TEXAS, INC., PLANNED | § | |
| PARENTHOOD SOUTH TEXAS, | § | |
| INC., PLANNED PARENTHOOD | § | |
| CAMERON COUNTY, INC., | § | |
| PLANNED PARENTHOOD SAN | § | |
| ANTONIO, INC., | § | |
| Defendants. | § | |

**APPENDIX TO PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO TRANSFER VENUE**

| Ex | DOCUMENT NAME | APPX. PAGE No. |
|----|---------------------------------------|-------------------|
| 1 | Declaration of David Drew Wright | Appx.001-003 |
| 1a | USA Today article | Appx.005 |
| 1b | Championtraveler.com (Amarillo) | Appx.006-018 |
| 1c | Championtraveler.com (Austin) | Appx.019-031 |
| 2 | Declaration of Donald Lochabay | Appx.032-034 |
| 3 | Declaration of Katherine Scheib | Appx.035-037 |
| 3a | Excerpt from HHSC Contract 529-16-007 | Appx.038-040 |

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATES OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., PLANNED PARENTHOOD GULF COAST, INC., PLANNED PARENTHOOD OF GREATER TEXAS, INC., PLANNED PARENTHOOD SOUTH TEXAS, INC., PLANNED PARENTHOOD CAMERON COUNTY, INC., PLANNED PARENTHOOD SAN ANTONIO, INC.,

Defendants.

Civil Action No. 2-21-CV-022-Z

DECLARATION OF DAVID DREW WRIGHT

I, David Drew Wright, declare:

1. My name is David Drew Wright. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. I am an Assistant Attorney General with the State of Texas for the Civil Medicaid Fraud Division.
3. On September 1, 2022, I accessed the website championtraveler.com and found information regarding the overall expense of traveling to both Amarillo and Austin. The website championtraveler.com was cited by USA Today about air traffic patterns in the United States. *See* Exh.1a (USA Today article re: championtraveler.com).

4. According to championtraveler.com, an average solo traveler will spend an average \$1,306 for a seven seven-day trip to Amarillo. *See* Exh. 1b (championtraveler.com – Amarillo). By contrast, the same solo traveler will spend an average \$2,116 for a seven-day trip to Austin. *See* Exh. 1c (championtraveler.com – Austin). These averages factor in costs incurred with food, travel, sightseeing, flights, and lodging. *See* Exh. 1b; Exh. 1c.
5. For costs incurred by anyone traveling to Amarillo or Austin for a trial, championtraveler.com recommends that a traveler budget \$31 to \$71 per day for transportation and dining in local restaurants in Amarillo. *See* Exh. 1b (championtraveler.com – Amarillo). By contrast, championtraveler.com recommends that a traveler budget \$66 to \$127 per day for transportation and dining in local restaurants in Austin. *See* Exh. 1c (championtraveler.com – Austin).
6. Of note is that championtraveler.com identifies March 26 through May 6 as some of the cheapest dates on which to travel to Amarillo. *See* Exh. 1b (championtraveler.com – Amarillo). The current trial setting in this case is April 24, 2023—in that relatively inexpensive time window in which to travel to Amarillo.
7. I spoke with the travel coordinator for the Office of the Attorney General (OAG)—Civil Medicaid Fraud Division (CMF). She informed me that the agency sets a hotel per diem amount for agency travel to cities across Texas and the United States. The agency follows Federal guidelines with a per diem for hotel stays. The per diem amount is commensurate with the relative expense of hotels in that city.
8. From my discussion with the CMF travel coordinator, as of August 2022, the Office of the Attorney General will authorize expenditure of up to \$96 per night for a hotel room in Amarillo, regardless of the month of travel.
9. Also from my discussion, as of August 2022, the Office of the Attorney General will authorize expenditure of between \$131 and \$161 per night for a hotel room in Austin, depending on the month of travel.

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct.

DATED: September 2, 2022

David Drew Wright
David Drew Wright

EXHIBIT 1A



FLIGHTS

Flyover country: Air-traffic analysis ranks all 50 states

Ben Abramson USA TODAY

Published 8:28 a.m. ET Nov. 15, 2017 | Updated 9:08 a.m. ET Jan. 10, 2018

Determining which state has the least flyover traffic is easy. There are no routes from one U.S. state to another that traverse Hawaii or Alaska. But which state has the most?

A new analysis by championtraveler.com found a way to answer that. By taking the total number of domestic flights that cross a state's airspace in one year and dividing it by the number of flights that arrive at one of its airports, the site has a statistic to rank flyover states.

And the "winner" is ... West Virginia, with 466,364 flights passing over the state and only 2,387 landing there, a ratio of 195-1. The site explains, "West Virginia's unavoidable geography between major hub cities means it will be flown over more, whereas a state like Alaska is never flown over by domestic travelers. However, in raw terms, 16 other states are flown over more often than West Virginia, but each one of them has a lower flyover ratio than West Virginia due to the number of destination flights."

The next closest is Kansas with 52.3 times the number of flyovers, followed by Mississippi (42.1), Iowa (39) and Kentucky (35.6). All numbers are based on DOT data for flights between August 2016 and July 2017.

The state with the most flyovers overall is Virginia, with 921,977, but with its busy airports in the D.C. suburbs it only ranks 7th for flyover ratio. And there's a special exception for the one state without regularly scheduled passenger service, Delaware.

See the table below for full rankings or, if you prefer the flyover experience, the slideshow above with one aerial photo from all 50 states.

EXHIBIT 1B



Cost of a Trip to Amarillo, TX, US & the Cheapest Time to Visit Amarillo

The average price of a 7-day trip to Amarillo is **\$1,306 for a solo traveler, \$2,346 for a couple, and \$4,397 for a family of 4**. Amarillo hotels range from \$42 to \$205 per night with an average of \$61, while most vacation rentals will cost \$230 to \$490 per night for the entire home. Average worldwide flight costs to Rick Husband Amarillo International Airport ([AMA](#)) are between \$665 and \$861 per person for economy flights and \$2,087 to \$2,702 for first class. Depending on activities, we recommend budgeting \$31 to \$71 per person per day for transportation and enjoying local restaurants.

See below for [average](#), [budget](#), and [luxury](#) trip costs. You can also [look up flight costs from your airport](#) for more tailored flight pricing.

Our Guests Love Us

Top-Rated Extended Stay Hotel

We are a top-ranked hotel with clean rooms and comfortable beds.

thirty-nine23.com

Trips on Kayak

The Cheapest Times to Visit Amarillo, TX, US

Appx.007

On average, these will be the cheapest dates to fly to AMA and stay in a Amarillo hotel:

- January 8th to February 25th
- March 26th to May 6th (except the week of April 2nd)
- August 13th to November 18th (except the week of October 15th)

The absolute cheapest time to take a vacation in Amarillo is usually **mid to late September**.

Average Amarillo Trip Costs

Average Solo Traveler

The average cost for one person to visit Amarillo for a week is

\$1,024-\$1,823
(\$146-\$260 per day)

Food, Travel, and Sightseeing: \$31 to \$71 per day for one person's daily expenses

Flights: \$459 to \$732 for economy

Lodging: \$58 to \$99 per night for one 2 or 3-star hotel room

or \$77 to \$94 per night for a 1-bed vacation rental

[Book Now](#)

Average Couple's Trip

The average cost for a couple to visit Amarillo for a week is

\$2,112-\$3,310
(\$302-\$473 per day)

Food, Travel, and Sightseeing: \$62 to \$142 per day for two people's daily expenses

Appx.008

Flights: \$918 to \$1,464 for economy

Lodging: \$58 to \$99 per night for one 2 or 3-star hotel room

or \$77 to \$94 per night for a 1-bed vacation rental

[Book Now](#)

Average Family Vacation

The average cost for 4 people to visit Amarillo for a week is

\$3,400-\$6,104

(\$486-\$872 per day)

Food, Travel, and Sightseeing: \$124 to \$284 per day for four people's daily expenses

Flights: \$1,836 to \$2,928 for economy

Lodging: \$116 to \$198 per night for two 2 or 3-star hotel rooms

or \$123 to \$141 per night for a 2-bed vacation rental

[Book Now](#)

Traveling Cheap to Amarillo

How cheap can you make a vacation to Amarillo? The cheapest trip to Amarillo is about \$113 per person per day for travelers willing to take standby flights, deal with inconvenience, and otherwise limit travel expenses. About 0% of rentals are available in the \$0 to \$100 range for an entire place, and vacation rentals can be booked for as low as \$234 per night. These inexpensive rentals must be booked as early as possible and may not be in the most desirable areas. 1-star hotels are more likely to be available, with rooms starting at around \$35.

Even cheaper trips are possible depending on where you live and whether you can drive.

[Check the cheapest times to fly](#) for more saving ideas.

Budget Solo Traveler

The lowest cost for one person to visit Amarillo for a week is

\$788-\$2,494

(\$113-\$356 per day)

Food, Travel, and Sightseeing: \$17 to \$34 per day for one person's daily expenses

Flights: \$459 to \$732 for economy

Lodging: \$35 to \$42 per night for one 1-star hotel room

or \$234 to \$254 per night for a 1-bed vacation rental

[Book Now](#)

Budget Couple's Trip

The lowest cost for a couple to visit Amarillo for a week is

\$1,366-\$3,464

(\$195-\$495 per day)

Food, Travel, and Sightseeing: \$34 to \$68 per day for two people's daily expenses

Flights: \$918 to \$1,464 for economy

Lodging: \$35 to \$42 per night for one 1-star hotel room

or \$234 to \$254 per night for a 1-bed vacation rental

[Book Now](#)

Budget Family Vacation

The lowest cost for 4 people to visit Amarillo for a week is

Appx.010

\$2,732-\$6,166

(\$390-\$881 per day)

Food, Travel, and Sightseeing: \$68 to \$136 per day for four people's daily expenses

Flights: \$1,836 to \$2,928 for economy

Lodging: \$70 to \$84 per night for two 1-star hotel rooms

or \$351 to \$381 per night for a 2-bed vacation rental

Book Now

Overall it is very possible to travel to Amarillo cheaply.

The Cost of a Luxury Amarillo Trip

There is no true ceiling on the cost of a luxury trip, so our estimates are based on what most people do in Amarillo.

Luxury Solo Traveler

The high-end price for one person to visit Amarillo for a week is

\$2,342-\$8,554

(\$335-\$1,222 per day)

Food, Travel, and Sightseeing: \$59 to \$149 per day for one person's daily expenses

Flights: \$1,317 to \$1,925 for first class

Lodging: \$102 to \$205 per night for one 4 or 5-star hotel room

or \$490 to \$931 per night for a preferred vacation rental

Book Now

Luxury Couple's Trip

The high-end price for a couple to visit Amarillo for a week is

\$4,072-\$11,522

(\$582-\$1,646 per day)

Food, Travel, and Sightseeing: \$118 to \$298 per day for two people's daily expenses

Flights: \$2,634 to \$3,850 for first class

Lodging: \$102 to \$205 per night for one 4 or 5-star hotel room

or \$490 to \$931 per night for a preferred vacation rental

[Book Now](#)

Luxury Family Vacation

The high-end price for 4 people to visit Amarillo for a week is

\$8,144-\$20,254

(\$1,163-\$2,893 per day)

Food, Travel, and Sightseeing: \$236 to \$596 per day for four people's daily expenses

Flights: \$5,268 to \$7,700 for first class

Lodging: \$204 to \$410 per night for two 4 or 5-star hotel rooms

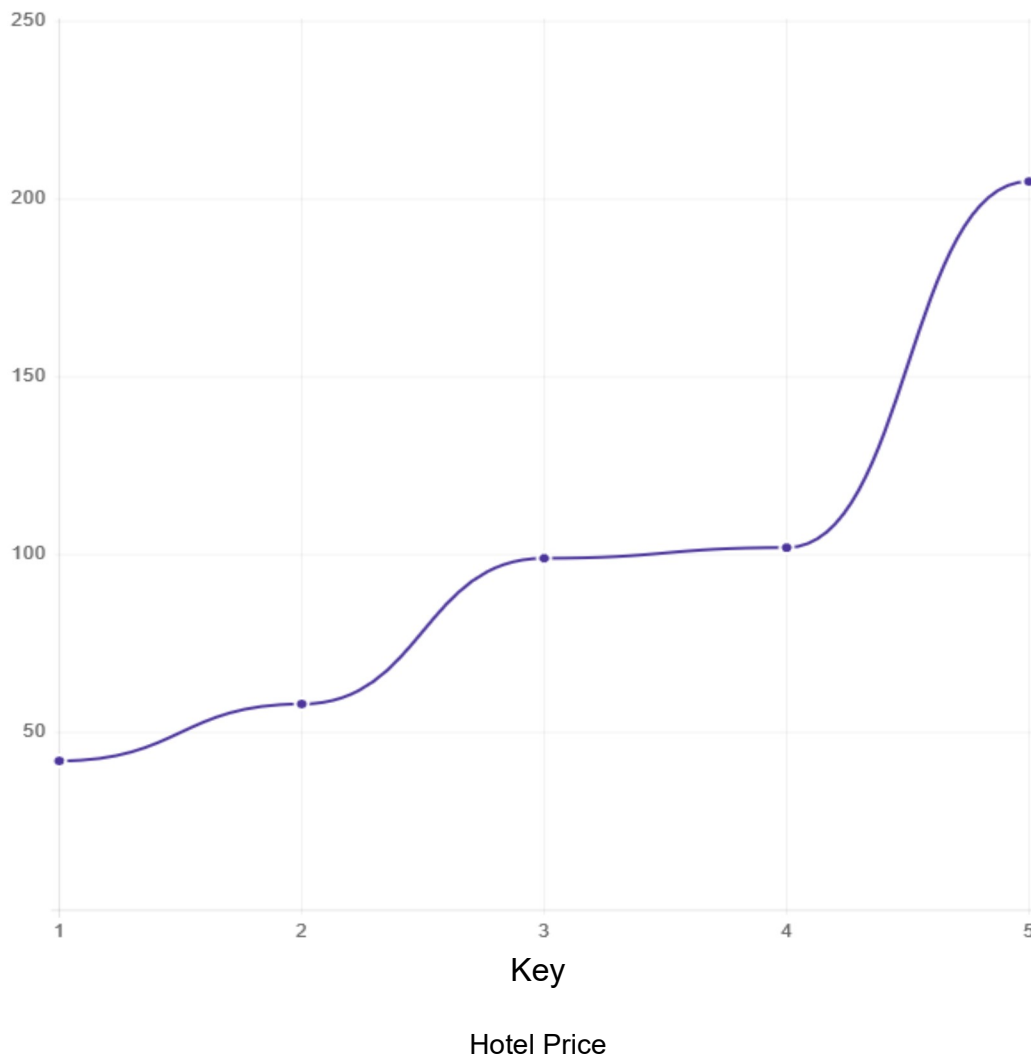
or \$686 to \$1,397 per night for a preferred vacation rental

[Book Now](#)

The cost of staying in Amarillo is slightly lower than the average city. On average hotels are less expensive than vacation rentals. Luxury vacation rentals are more expensive in Amarillo due to very high property costs. The graphs below show how much cost can vary depending on the type of experience you're looking for.

Amarillo Lodging Cost by Star Status

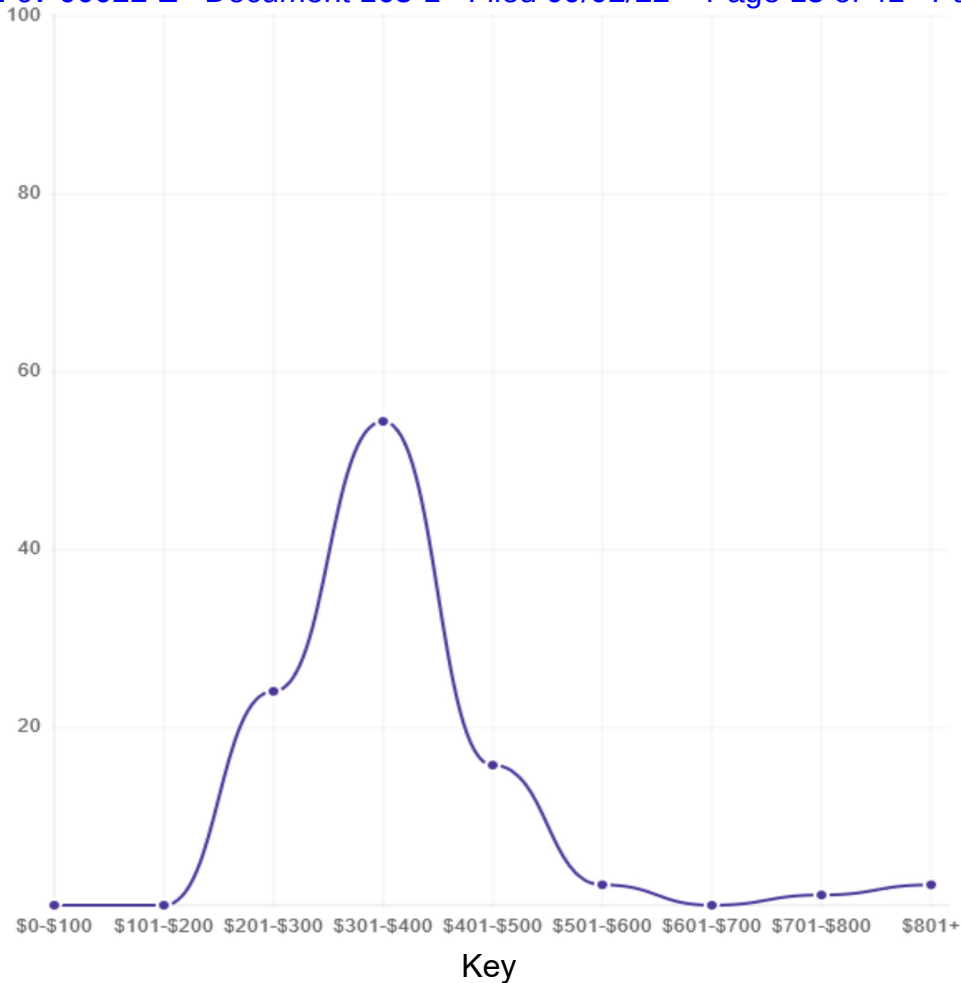
The average price for the class of hotel is on the (y) axis. The hotel class (out of 5 stars) is on the (x) axis.



Prices are based on Amarillo hotel averages and may not reflect current prices. In some cases, we extrapolate prices to estimate costs, and hotels with your desired star rating may not be available.

Vacation Rental Prices

The percent of vacation rentals in the price range is on the left (y) axis. Price range is on the bottom (x) axis.



Percent of rentals

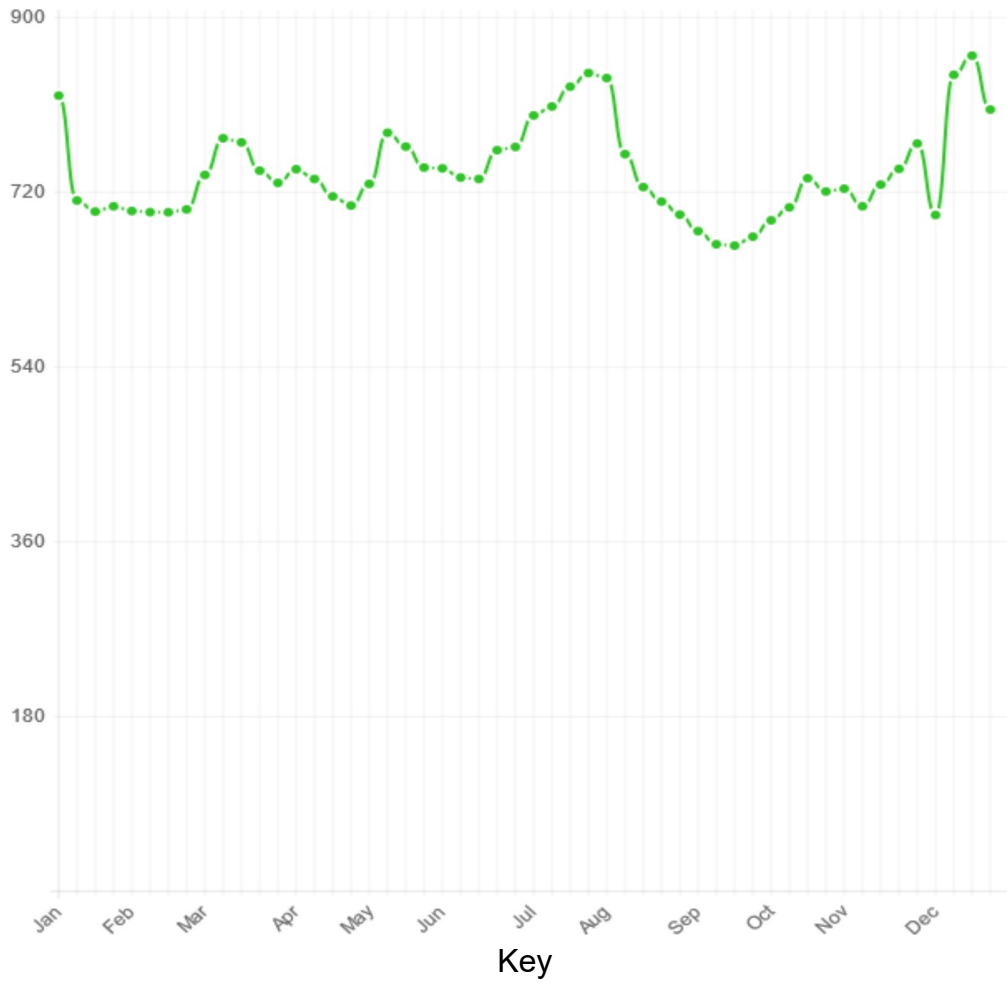
There are many options for vacation rentals across many price ranges in Amarillo.

Hotels on Kayak

Flight Costs to Amarillo

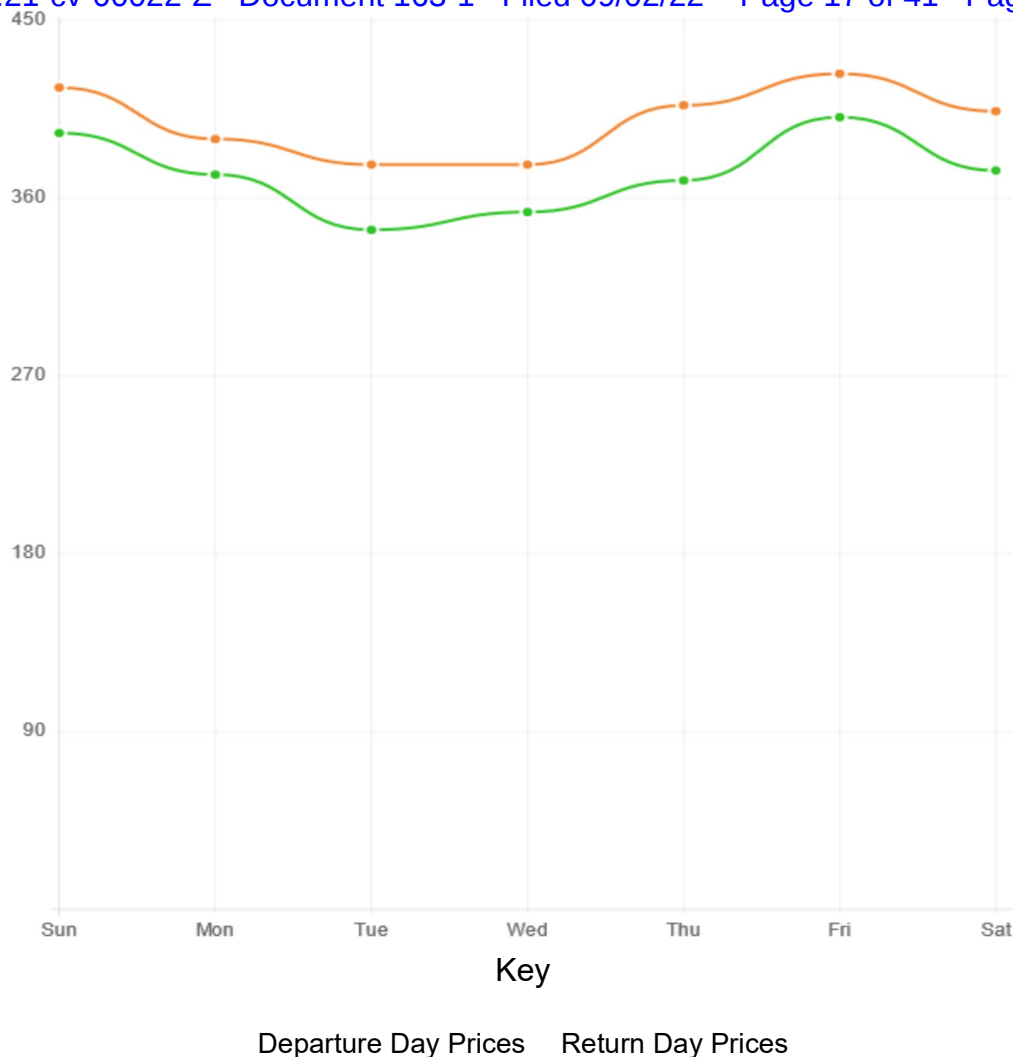
Averaging flights around the world, prices go from a high of \$861 average in mid December to a low of \$665 in mid to late September. Median flight price is \$502. These prices are based on millions of flights. For Amarillo our data includes 178 originating airports, and 62 airlines. The area has average variance in price compared with other locations. Flying to Amarillo from an airport like Shevchenko ([SCO](#)) in Aktau (Kazakhstan) for an average \$6,407 trip fare will obviously cost a lot more than from an airport like George Bush Intercontinental/Houston ([IAH](#)) in Houston, TX (the United States) at an average of just \$253.

Average Flight Cost by Season



Worldwide Flight Prices

Average Flight Cost by Day of Week



The cheapest day to fly in is typically Tuesday, and the cheapest day to fly back is usually Tuesday. Click [here](#) to see data for the cost of flights from your airport. In Amarillo, the difference between the cheapest and the most expensive week is about \$196, so you can easily save about 29% simply by using our free flight guides and booking in advance.

Flights on Kayak

Daily Expenses Budget

Daily vacation expenses vary more based on what you're interested in doing. A fine dining restaurant with drinks around Amarillo can easily cost \$260 per person or more, while a standard nice meal might be about \$17 per person. Private tours can cost \$510 per day, but self-guided tours to see the outdoor sights can be free. Costs vary wildly, so

Appx.016

recommendations are made based on the cost of living and averages we see for this type of vacation.

Our Guests Love Us

Top-Rated Extended Stay Hotel

We are a top-ranked hotel with clean rooms and comfortable beds.

thirty-nine23.com

Trips on Kayak

Other Amarillo Guides

- [The Best Time to Visit Amarillo](#)

Travel Costs Nearby

- [Canyon, TX, US](#)
- [Dumas, TX, US](#)
- [Vega, TX, US](#)
- [Borger, TX, US](#)
- [Hereford, TX, US](#)
- [Clarendon, TX, US](#)
- [Plainview, TX, US](#)
- [Pampa, TX, US](#)
- [Dalhart, TX, US](#)
- [Littlefield, TX, US](#)

Flights

- [DAL to AMA](#)

Appx.017

- [DFW to AMA](#)
- [LAS to AMA](#)
- [IAH to AMA](#)
- [DEN to AMA](#)
- [PHX to AMA](#)
- [AUS to AMA](#)
- [LAX to AMA](#)
- [SLC to AMA](#)
- [BWI to AMA](#)

Travel Costs in Popular Places

- [Prague, Czechia](#)
- [Sharm el Sheikh, Egypt](#)
- [Takua Pa, Thailand](#)

[The Cost of a Trip Anywhere](#) › [the United States](#) › Amarillo, TX, US

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EXHIBIT 1C



Cost of a Trip to Austin, TX, US & the Cheapest Time to Visit Austin

The average price of a 7-day trip to Austin is **\$2,116 for a solo traveler, \$3,800 for a couple, and \$7,125 for a family of 4**. Austin hotels range from \$60 to \$448 per night with an average of \$143, while most vacation rentals will cost \$210 to \$1060 per night for the entire home. Average worldwide flight costs to Austin – Bergstrom International Airport ([AUS](#)) are between \$665 and \$1,077 per person for economy flights and \$2,087 to \$3,380 for first class. Depending on activities, we recommend budgeting \$66 to \$127 per person per day for transportation and enjoying local restaurants.

See below for [average](#), [budget](#), and [luxury](#) trip costs. You can also [look up flight costs from your airport](#) for more tailored flight pricing.

Luxury Student Austin

The Mark Austin

Trips on Kayak

The Cheapest Times to Visit Austin, TX, US

Appx.020

On average, these will be the cheapest dates to fly to AUS and stay in a Austin hotel:

- January 8th to March 4th
- August 6th to December 9th (except the week of November 26th)

The absolute cheapest time to take a vacation in Austin is usually **mid to late September**.

Average Austin Trip Costs

Average Solo Traveler

The average cost for one person to visit Austin for a week is

\$1,492-\$3,280
(\$213-\$469 per day)

Food, Travel, and Sightseeing: \$66 to \$127 per day for one person's daily expenses

Flights: \$436 to \$969 for economy

Lodging: \$99 to \$150 per night for one 2 or 3-star hotel room

or \$194 to \$237 per night for a 1-bed vacation rental

[Book Now](#)

Average Couple's Trip

The average cost for a couple to visit Austin for a week is

\$2,848-\$5,354
(\$407-\$765 per day)

Food, Travel, and Sightseeing: \$132 to \$254 per day for two people's daily expenses

Flights: \$872 to \$1,938 for economy

Appx.021

Lodging: \$99 to \$150 per night for one 2 or 3-star hotel room

or \$194 to \$237 per night for a 1-bed vacation rental

[Book Now](#)

Average Family Vacation

The average cost for 4 people to visit Austin for a week is

\$4,780-\$9,424
(\$683-\$1,346 per day)

Food, Travel, and Sightseeing: \$264 to \$508 per day for four people's daily expenses

Flights: \$1,744 to \$3,876 for economy

Lodging: \$198 to \$300 per night for two 2 or 3-star hotel rooms

or \$291 to \$332 per night for a 2-bed vacation rental

[Book Now](#)

Traveling Cheap to Austin

How cheap can you make a vacation to Austin? The cheapest trip to Austin is about \$136 per person per day for travelers willing to take standby flights, deal with inconvenience, and otherwise limit travel expenses. About 1% of rentals are available in the \$0 to \$100 range for an entire place, and vacation rentals can be booked for as low as \$85 per night. These inexpensive rentals must be booked as early as possible and may not be in the most desirable areas. 1-star hotels are more likely to be available, with rooms starting at around \$52.

Even cheaper trips are possible depending on where you live and whether you can drive.

[Check the cheapest times to fly](#) for more saving ideas.

Budget Solo Traveler

The lowest cost for one person to visit Austin for a week is

\$951-\$2,005

(\$136-\$286 per day)

Food, Travel, and Sightseeing: \$29 to \$58 per day for one person's daily expenses

Flights: \$436 to \$969 for economy

Lodging: \$52 to \$60 per night for one 1-star hotel room

or \$85 to \$105 per night for a 1-bed vacation rental

[Book Now](#)

Budget Couple's Trip

The lowest cost for a couple to visit Austin for a week is

\$1,590-\$3,380

(\$227-\$483 per day)

Food, Travel, and Sightseeing: \$58 to \$116 per day for two people's daily expenses

Flights: \$872 to \$1,938 for economy

Lodging: \$52 to \$60 per night for one 1-star hotel room

or \$85 to \$105 per night for a 1-bed vacation rental

[Book Now](#)

Budget Family Vacation

The lowest cost for 4 people to visit Austin for a week is

Appx.023

\$3,180-\$6,508

(\$454-\$930 per day)

Food, Travel, and Sightseeing: \$116 to \$232 per day for four people's daily expenses

Flights: \$1,744 to \$3,876 for economy

Lodging: \$104 to \$120 per night for two 1-star hotel rooms

or \$136 to \$168 per night for a 2-bed vacation rental

[Book Now](#)

Overall it is very difficult to travel to Austin cheaply.

The Cost of a Luxury Austin Trip

There is no true ceiling on the cost of a luxury trip, so our estimates are based on what most people do in Austin.

Luxury Solo Traveler

The high-end price for one person to visit Austin for a week is

\$3,250-\$15,538

(\$464-\$2,220 per day)

Food, Travel, and Sightseeing: \$139 to \$241 per day for one person's daily expenses

Flights: \$1,107 to \$2,403 for first class

Lodging: \$195 to \$448 per night for one 4 or 5-star hotel room

or \$1,060 to \$1,908 per night for a preferred vacation rental

[Book Now](#)

Luxury Couple's Trip

The high-end price for a couple to visit Austin for a week is

\$5,330-\$19,628
(\$761-\$2,804 per day)

Food, Travel, and Sightseeing: \$278 to \$482 per day for two people's daily expenses

Flights: \$2,214 to \$4,806 for first class

Lodging: \$195 to \$448 per night for one 4 or 5-star hotel room

or \$1,060 to \$1,908 per night for a preferred vacation rental

[Book Now](#)

Luxury Family Vacation

The high-end price for 4 people to visit Austin for a week is

\$10,660-\$34,678
(\$1,523-\$4,954 per day)

Food, Travel, and Sightseeing: \$556 to \$964 per day for four people's daily expenses

Flights: \$4,428 to \$9,612 for first class

Lodging: \$390 to \$896 per night for two 4 or 5-star hotel rooms

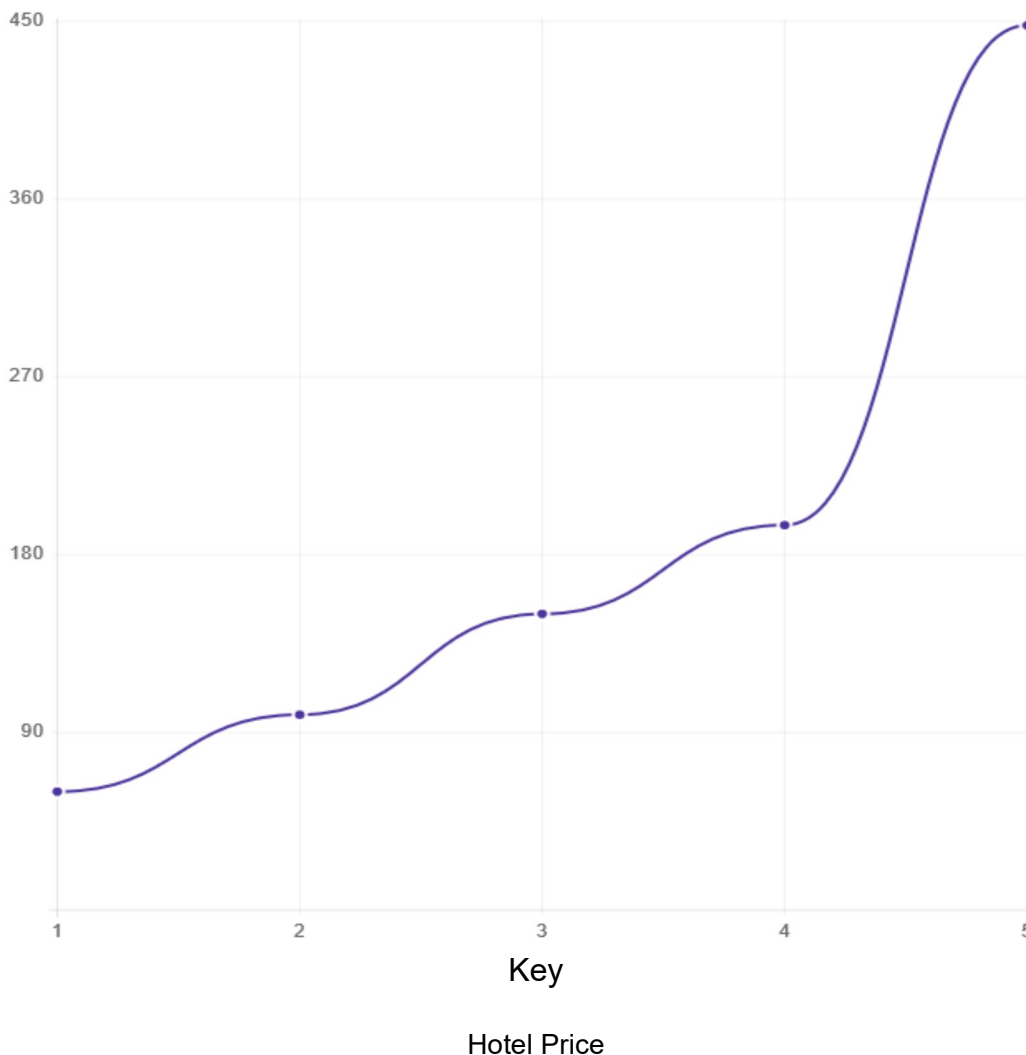
or \$1,484 to \$3,053 per night for a preferred vacation rental

[Book Now](#)

The cost of staying in Austin is much higher than the average city. On average hotels are less expensive than vacation rentals. Luxury vacation rentals are more expensive in Austin due to very high property costs. The graphs below show how much cost can vary depending on the type of experience you're looking for.

Austin Lodging Cost by Star Status

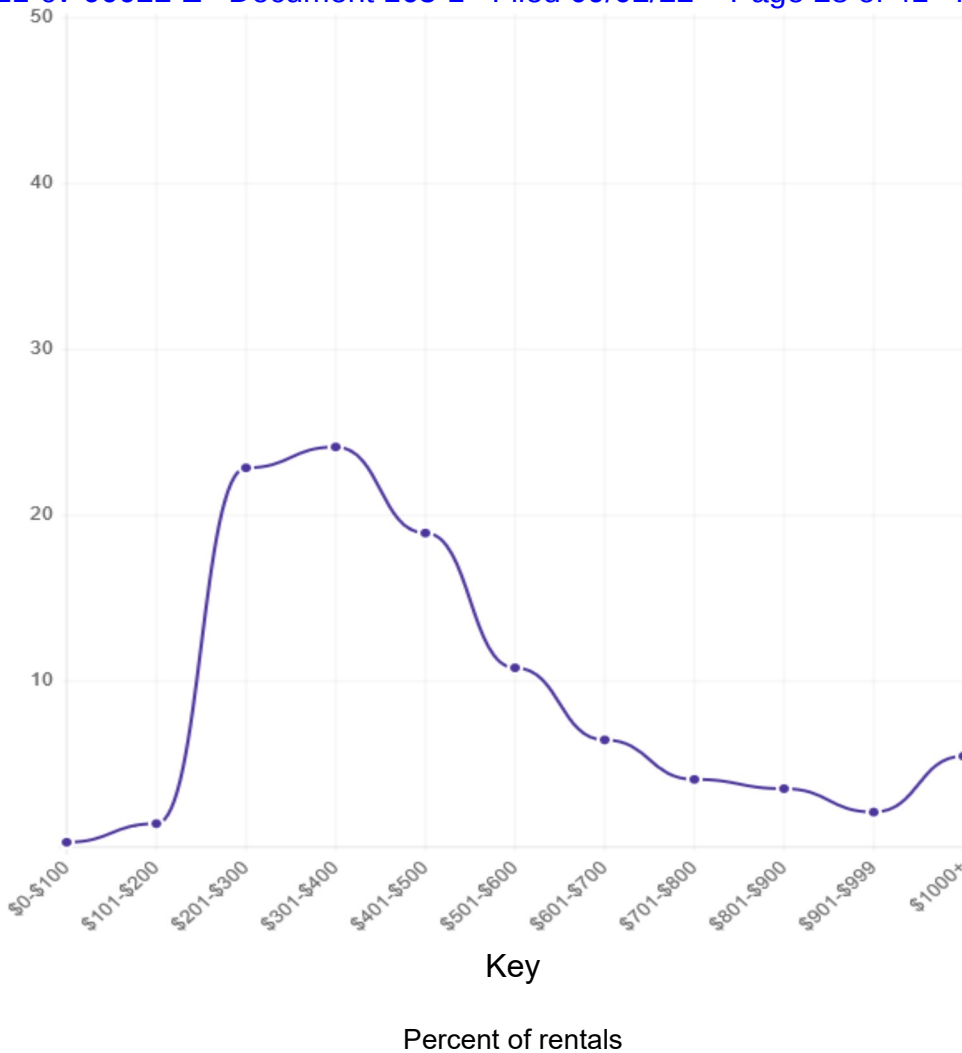
The average price for the class of hotel is on the (y) axis. The hotel class (out of 5 stars) is on the (x) axis.



Prices are based on Austin hotel averages and may not reflect current prices. In some cases, we extrapolate prices to estimate costs, and hotels with your desired star rating may not be available.

Vacation Rental Prices

The percent of vacation rentals in the price range is on the left (y) axis. Price range is on the bottom (x) axis.



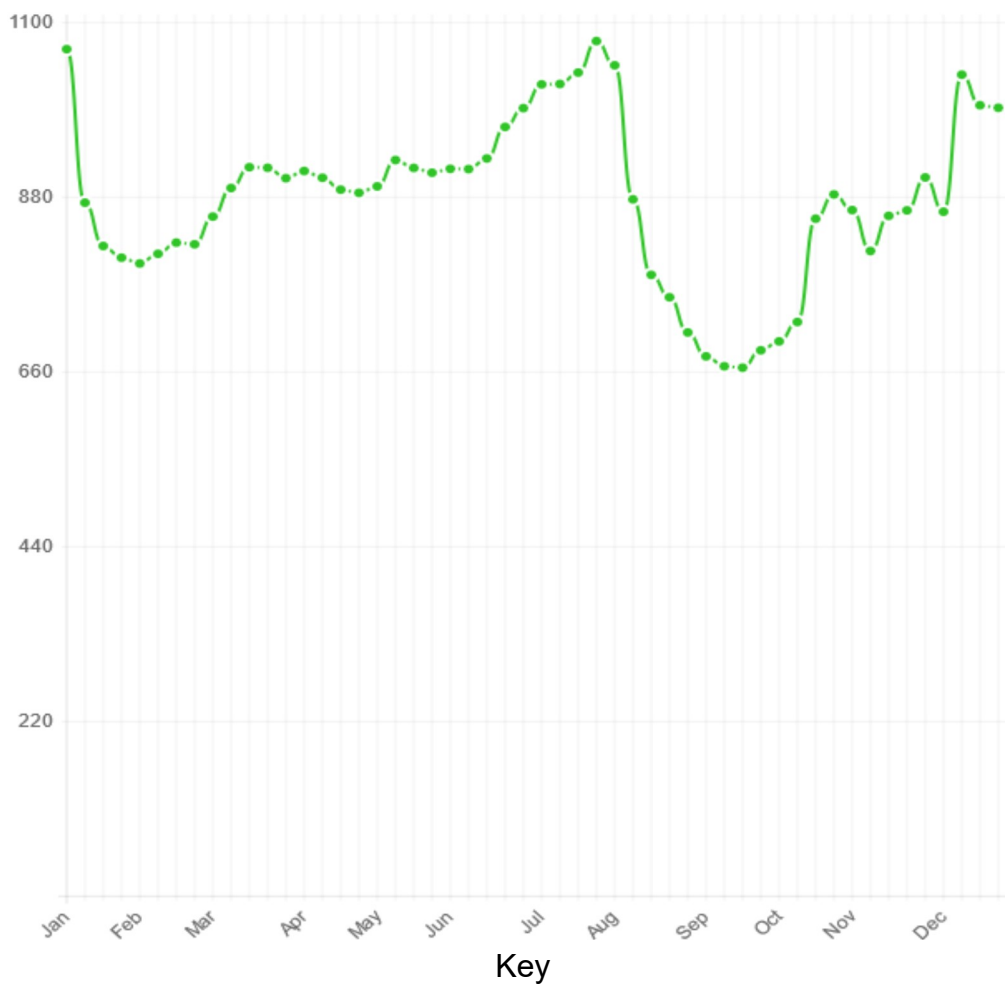
There are a healthy amount of vacation rentals serving all budgets in Austin.

Hotels on Kayak

Flight Costs to Austin

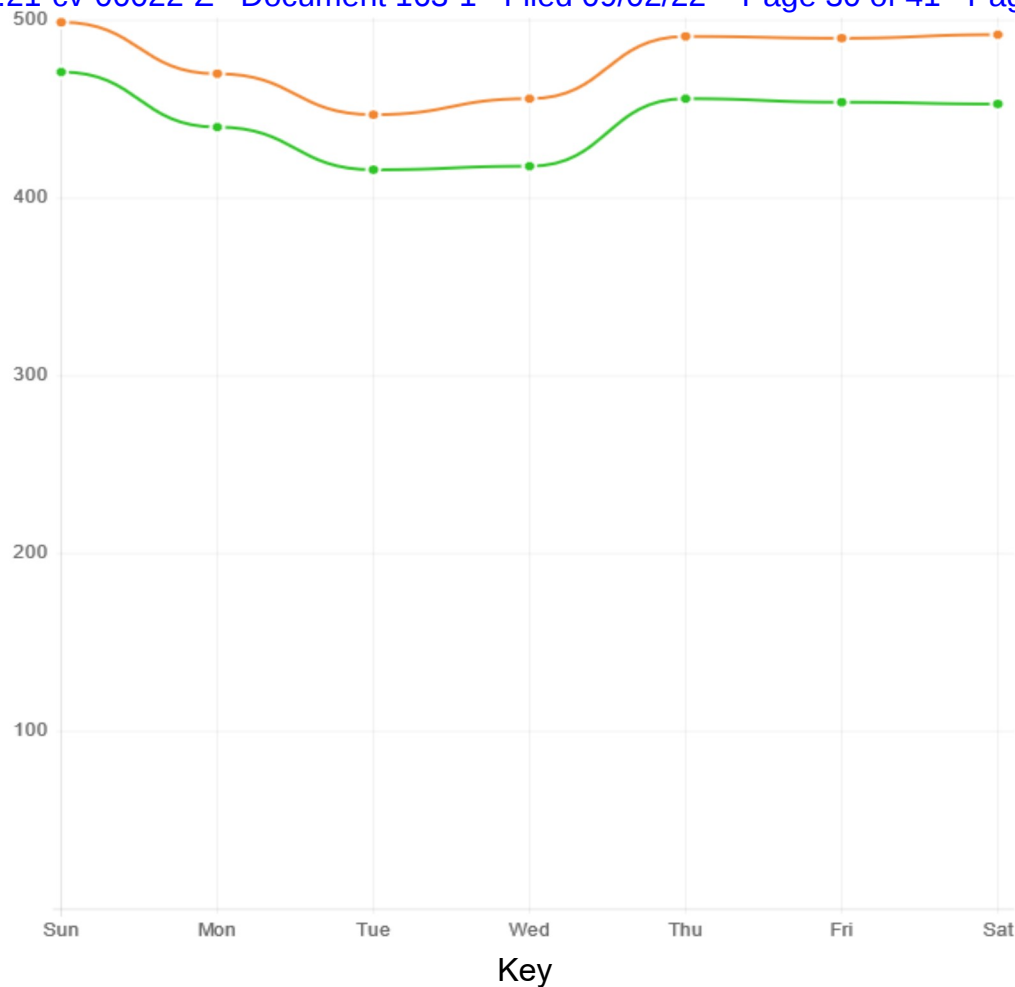
Averaging flights around the world, prices go from a high of \$1,077 average in late July to a low of \$665 in mid to late September. Median flight price is \$671. These prices are based on millions of flights. For Austin our data includes 819 originating airports, and 143 airlines. The area has more variance in price compared with other locations. Flying to Austin from an airport like Simpang Tiga ([PKU](#)) in Pekanbaru (Indonesia) for an average \$6,747 trip fare will obviously cost a lot more than from an airport like Los Angeles International ([LAX](#)) in Los Angeles, CA (the United States) at an average of just \$206.

Average Flight Cost by Season



Worldwide Flight Prices

Average Flight Cost by Day of Week



Departure Day Prices Return Day Prices

The cheapest day to fly in is typically Tuesday, and the cheapest day to fly back is usually Tuesday. Click [here](#) to see data for the cost of flights from your airport. In Austin, the difference between the cheapest and the most expensive week is about \$411, so you can easily save about 62% simply by using our free flight guides and booking in advance.

Flights on Kayak

Daily Expenses Budget

Daily vacation expenses vary more based on what you're interested in doing. A fine dining restaurant with drinks around Austin can easily cost \$440 per person or more, while a standard nice meal might be about \$29 per person. Private tours can cost \$875 per day, but self-guided tours to see the outdoor sights can be free. Costs vary wildly, so

Appx.029

recommendations are made based on the cost of living and averages we see for this type of vacation.

Travel Packag 2023

Exoticca

Trips on Kayak

Other Austin Guides

- [The Best Time to Visit Austin](#)

Travel Costs Nearby

- [Downtown Austin, TX, US](#)
- [Montopolis, TX, US](#)
- [Franklin Park, TX, US](#)
- [North Central Austin, TX, US](#)
- [Northwest Austin, TX, US](#)
- [Del Valle, TX, US](#)
- [Wells Branch, TX, US](#)
- [Buda, TX, US](#)
- [Pflugerville, TX, US](#)
- [Manor, TX, US](#)

Flights

- [DFW to AUS](#)

Appx.030

- [ATL to AUS](#)
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EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATES OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., PLANNED PARENTHOOD GULF COAST, INC., PLANNED PARENTHOOD OF GREATER TEXAS, INC., PLANNED PARENTHOOD SOUTH TEXAS, INC., PLANNED PARENTHOOD CAMERON COUNTY, INC., PLANNED PARENTHOOD SAN ANTONIO, INC.,

Defendants.

Civil Action No. 2-21-CV-022-Z

DECLARATION OF DONALD LOCHABAY, JR.

I, Donald Lochabay, Jr., hereby declare:

1. My name is Donald Lochabay, Jr.. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. I have been retained as an expert witness by The State of Texas in connection with the litigation styled *United States of America ex rel. Doe, et al., v. Planned Parenthood Federation of America Inc., et al.*
3. I provided two expert reports in this case on July 1, 2022 in which I opined on Texas and Louisiana Medicaid program expenditures and potential unlawful acts related to Planned Parenthood services that Plaintiffs are seeking to recover.

4. One Defendant in this case, Planned Parenthood Greater Texas (PPGT), operates clinics located within, what I understand from the attorneys in this case to be, the Northern District of Texas.
5. Based on my review of claims data at issue in this action, I have determined that approximately 30% of the total Texas Medicaid claim expenditures to the Planned Parenthood organization during the relevant time period at issue in this case were paid to Planned Parenthood Greater Texas clinics.
6. I understand that this case is set for trial in Amarillo, and I am ready and able to attend trial as an expert witness for Plaintiffs.
7. I have traveled across Texas for various trials and legal proceedings. A transfer of venue in this case is not needed to accommodate me.

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct.

DATED: September 2, 2022

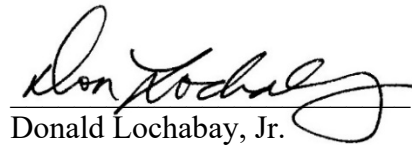

Donald Lochabay, Jr.

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATES OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., PLANNED PARENTHOOD GULF COAST, INC., PLANNED PARENTHOOD OF GREATER TEXAS, INC., PLANNED PARENTHOOD SOUTH TEXAS, INC., PLANNED PARENTHOOD CAMERON COUNTY, INC., PLANNED PARENTHOOD SAN ANTONIO, INC.,

Defendants.

Civil Action No. 2-21-CV-022-Z

DECLARATION OF KATHERINE SCHEIB

I, Katherine Scheib, declare:

1. My name is Katherine Scheib. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. I am the Deputy Associate Commissioner for Operations with HHSC.
3. HHSC understands that this case is set for trial in Amarillo, and HHSC will be ready and able to assist with providing necessary witnesses in Amarillo. HHSC is regularly part of litigation around the state, including in Amarillo. HHSC witnesses typically testify around the state, including in Amarillo. HHSC counsel typically represent HHSC at hearings and at trial around the state, including in Amarillo. A transfer of venue in this case is not needed to accommodate HHSC.

4. Additionally, a transfer of venue in this case is not needed to accommodate the Texas Medicaid & Healthcare Partnership (TMHP). On its website, TMHP describes itself as “a group of contractors under the leadership of Accenture. Accenture administers Texas Medicaid and other state health-care programs on behalf of the Texas Health and Human Services Commission.” *About TMHP*, <https://www.tmhp.com/about-tmhp> (last visited September 1, 2022). Accenture and HHSC have a duty under their contract with HHSC to support OAG litigation, such as this case, “e.g. by providing testimony, documentation, etc.” Please see Exhibit 3a, attached to this Declaration, Excerpt from HHSC Contract 529-16-007, Agreement Between HHSC and Accenture State Healthcare Services LLC [A part of TMHP] for Texas Medicaid Manage Information System Takeover, at Attachment 27: Office of the Attorney General (OAG), p. 3. This requirement of litigation support can be carried out in Amarillo. There is no requirement that this support of OAG litigation be done in Austin and not Amarillo.

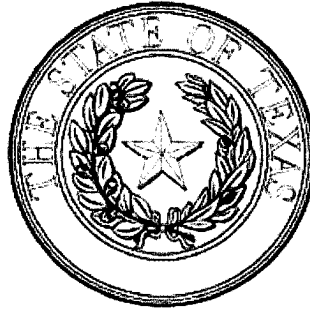
I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct.

DATED: _____



Katherine Scheib

EXHIBIT 3A



**AGREEMENT
BETWEEN
THE HEALTH AND HUMAN SERVICES COMMISSION
AND
ACCENTURE STATE HEALTHCARE SERVICES LLC
FOR
TEXAS MEDICAID MANAGEMENT INFORMATION SYSTEM
TAKEOVER**

RFP No. 529-16-0007

EXHIBIT B
Attachment 27
Office of the Attorney General (OAG)

and offer storage capacity options such as expanded capacity funded through a change order.

OAG - 0026

Litigation Support

Support litigation and/or administrative hearing activities (e.g., by providing testimony, documentation, etc.), as required by the State.

OAG - 0027

Litigation Support

Supply all reports, files, copies, and other documentation requested by the State, Department of Justice (DOJ) or other federal entities to support their prosecution or defense of lawsuits.

OAG - 0028

Litigation Support

In support of pending litigation, and as requested by the State, analyze the data and provide the initial and final results to HHSC or its designee.

OAG - 0029

Litigation Support

Assist the State in due diligence required for paper and/or electronic discovery obligations that arise in litigation. Assist the State and/or the OAG in litigation document retention holds, as instructed by the State and/or the OAG.

OAG - 0030

Litigation Support

Strictly comply with all litigation holds issued by the State.